

I oppose RM-10868 totally. The FCC asked for and received input on code testing in NPRM 98-143 and in the 98-143 R&O noted that but for the ITU treaty only, code testing for HF access would only be 5 wpm. The ITU treaty ended the code requirement in July 2003 and with that change there is no valid reason for any code testing at all. Indeed, in response to the ITU change, many western nations have already dropped code testing.

Additionally, the concept of creating and maintaining a secret question pool as proposed in this RM-10868 is total folly given the ease and ability to share information almost instantly today via the internet. The internal FCC question pool became quite public in the 60s when sharing information was far more difficult. To expect any such secrecy of questions to last more than a few weeks is, as already stated, complete folly.